

APR 23 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT
ROANOKE DIVISION

JULIA C. DUDLEY, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA : Criminal No. 7:15-CR-000 26
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 :
 : In violation of:
 v. : Title 18 U.S.C. § 1591(a)
 : Title 18 U.S.C. § 1592(a)(3)(A)
 : Title 18 U.S.C. § 2421
 TREMAYNE KIRBY : Title 18 U.S.C. § 2422
 : Title 18 U.S.C. § 2

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On a date not known to the grand jury, but in or around and between January 2014 and May 2014, in the Western District of Virginia and elsewhere, TREMAYNE KIRBY, the defendant, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, V1, knowing or in reckless disregard of the fact that force, threats of force, fraud, and coercion as described in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, would be used to cause V1 to engage in a commercial sex act.

2. All in violation of Title 18, United States Code, Section 1591(a).

COUNT TWO

3. In or about April 2014, in the Western District of Virginia and elsewhere, TREMAYNE KIRBY, the defendant, as a principal or aider and abettor, did knowingly transport V1 in interstate commerce, from Virginia to New Jersey, to engage in prostitution or in any sexual act for which any person can be charged with a criminal offense.

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- United States Code,
4. All in violation of Title 18, Sections 2421 and 2.

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COUNT THREE

5. In or about April 2014, in the Western District of Virginia and elsewhere, TREMAYNE KIRBY, the defendant, did knowingly persuade, induce, coerce, and entice V1 to travel in interstate commerce to engage in prostitution or in any sexual act for which any person can be charged with a criminal offense.

6. All in violation of Title 18, United States Code, Section 2422(a).

COUNT FOUR

7. On or about April 14, 2015, in the Western District of Virginia and elsewhere, TREMAYNE KIRBY, the defendant, as a principal or aider and abettor, did knowingly transport V2, V3, and V4 in interstate commerce to engage in prostitution or in any sexual act for which any person can be charged with a criminal offense.

- United States Code,
8. All in violation of Title 18, Sections 2421 and 2.

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COUNT FIVE


9. From a date unknown to the Grand Jury but at least from January 2014 through April 2015, within the Western District of Virginia and elsewhere, TREMAYNE KIRBY, the defendant, together with others, did knowingly and intentionally use a facility in interstate commerce, to wit: the Internet, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, to wit: a business enterprise involving prostitution in violation of federal law and the laws of the States of Virginia, New Jersey, and North Carolina, and did thereafter perform and attempt to perform the promotion, establishment, carrying on and facilitation of the promotion, management, establishment, and carrying on of such unlawful activity, to wit: providing and using a phone with an internet connection for advertising prostitution services on www backpage.com,

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transporting victims from Virginia to other states, including New Jersey and North Carolina, and providing hotel rooms for use in the performance of prostitution services.

10. All in violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

A TRUE BILL, this 23 day of April, 2015.


Anthony P. Giorno
ACTING UNITED STATES ATTORNEY

/s/ Foreperson
FOREPERSON